

FACT SHEET #31 – INSTRUCTIONS - SF 1445 – Labor Interviews

CLEAN AND DRINKING WATER SRF PROJECTS

Information about the form for conducting periodic Davis-Bacon labor interviews at the job site.

Davis-Bacon requires labor interviews to ensure compliance. **SF 1445 – Labor Standards Interview** is the form used by the Department of Labor. That form may be downloaded from the Iowa Finance Authority's website: www.iowafinanceauthority.gov/davisbacon .

Interviews should be conducted in the following manner:

- **INTERVIEWER.** Each borrower/City is required to use a consulting engineer or the firm's staff, public works director, or someone else unaffiliated with the contractors and on site regularly to conduct interviews.
- **NUMBER OF INTERVIEWS.** The task will consist of doing a "representative sample" of interviews using the attached form. EPA suggests that 10-20% of the workers on site when you arrive is sufficient. Please try to interview at least one person from every contractor/subcontractor company there to get a variety of trades.
- **TIMING.** The federal guidance states that interviews should be done on, at minimum, two different occasions. One should be within the first two weeks after actual construction begins and payrolls are submitted. The second round should occur closer to substantial completion, while workers are still on site. Additional interviews should be done when issues or discrepancies arise and should be targeted at the contractor in question.
- **PURPOSE OF INTERVIEWS.** The purpose of the interview is to uncover discrepancies between the work actually being done by construction workers and the job titles/wages being reported on the certified payrolls. Each interview should probably only take about 10 minutes and is to be done confidentially to protect the workers. Interviews should then be compared to payrolls to identify inconsistencies, if any.
- **RECORDS.** At the end of the project, interview forms should be kept with the rest of the project records for a period of no less than 3 years. The interview forms have identifying employee information that should be kept confidential from contractors generally, but the project folders should be available for inspection by the Iowa Finance Authority, Environmental Protection Agency, or Department of Labor upon request.

QUESTIONS: Contact Lynzey Tharp with the State Revolving Fund at the Iowa Finance Authority at 515-725-4955 or via email at Lynzey.Tharp2@iowa.gov .